<u>REMARKS</u>

Claims 1-14 and 18-22 are now pending in the application, with claims 1 and 8 being the independent claims. Reconsideration and further examination are respectfully requested.

In the Office Action, objection was made to claim 6 for omitting the word "includes". In response, claim 6 has been amended above to correct this error. Accordingly, withdrawal of this objection is respectfully requested.

Also, an objection and a rejection under 35 USC § 112, second paragraph, were made with respect to claim 15. However, the cancellation of claim 15 above renders the objection and § 112 rejection moot.

The Office Action further notes that the proprietary nature of the "RosettaNet" mark should be maintained by capitalizing the term wherever it appears and also using the generic terminology. It is believed that all usages of that term in the Specification include the appropriate capitalization, and sufficient generic language is included to make clear that the term "RosettaNet" is being used as a trademark. In addition, claims 4 and 13 have been amended above to include similar generic terminology.

The Office Action also notes that claims 7 and 18-20 included the "XQL" and "XML" acronyms, but did not clarify what such acronyms represent. Accordingly, those claims have been amended above in order to fully spell out the phrases to which those acronyms correspond.

Claims 1-20 were rejected under 35 USC § 103(a) over U.S. Patent 7,051,072 (Stewart). Withdrawal of this rejection is respectfully requested for the following reasons.

The present invention concerns systems, methods and techniques for facilitating communications between entities and is applicable, e.g., to automated conversations between trading partners. One aspect of the present invention is the conversion of a message having a

data representation used by an internal business process into a corresponding message having a communication format specified by an applicable interaction standard, such as a RosettaNet or Common Business Library (CBL) standard.

Thus, independent claim 1 is directed to a method for enabling at least one internal business process that uses a first data representation and that includes at least one activity that involves a trading partner to communicate with the trading partner through an interaction standard. A message having the first data representation is received from the internal business process, and the message automatically is converted into a corresponding message having the communication format specified by the interaction standard.

The foregoing combination of features is not disclosed or suggested by the applied art. For instance, Stewart does not disclose or suggest at least the presently recited feature of automatically converting a message having a data representation used by an internal business process into a corresponding message having a communication format specified by an applicable interaction standard.

In this regard, Stewart concerns the use of a collaboration hub for managing conversations among multiple trading partners. However, Stewart does not appear to say anything at all about automatically converting messages provided by an internal business process of any such trading partner, much less automatic conversion of messages as presently recited.

The specific portions of Stewart cited in the Office Action as showing the recited automatic conversion feature are Stewart's Abstract, Figure 1 and column 4 line 65 through column 6 line 14 of Stewart. However, those portions of Stewart have been studied in particular detail and are not seen to say anything at all about any kind of automatic message conversion.

Stewart's Abstract generally references the use of a collaboration hub for hosting conversations among trading partners. However, the hub's purpose is only described as appropriately transferring (or routing) data between participants. Nothing in Stewart's Abstract indicates that its hub performs any kind of conversion at all. To the contrary, the final clause of Stewart's Abstract indicates that all participating trading partners must strictly observe certain defined communication protocols ("...a hub transport that allows a participant to send and receive data from the collaboration hub in accordance with the definitions of the collaboration space.").

Figure 1 of Stewart illustrates a collaboration system in which a collaboration server 116 interfaces between a workflow server 104 and an application server 102. See, e.g., column 11 lines 6-67 of Stewart. However, nothing in Figure 1 itself or in any other portion of Stewart indicates that the collaboration server 116 (or any other illustrated component) performs any kind of automatic conversion. Rather, Stewart only indicates that the function of collaboration server 116 is to appropriately route messages. See, e.g., column 11 lines of 64-67 of Stewart ("Messages from different trading partners, or in some instances the workflows of different trading partners, are filtered by the collaboration server, and routed to the appropriate recipients in a true collaborative fashion.").

Column 4 line 65 through column 6 line 14 of Stewart (the Summary section) generally discusses Stewart's system, as well as the supposed need for it. Consistent with the other portions of Stewart discussed above, Stewart's Summary describes the use of a collaboration hub for the sole purpose of routing messages between participants. See, e.g., column 5 lines 58-62 ("As conversations and business processes are initiated, executed and completed, conversation management software tracks and manages these long-living conversations, ensures that they are completed, and orchestrates the overall process execution.").

Once again, however, no mention is made of any kind of automatic conversion whatsoever. To the contrary, Stewart's Summary clearly reiterates that all conversation participants must submit messages in strict accordance with defined communication protocols. See, e.g., column 5 lines 54-56 ("...well-defined and ordered sets of related messages are exchanged between trading partners."); and column 6 lines 9-13 ("...a collaboration space defining the rules governing said transfer of data and the role of said participants, a hub transport that allows a participant to send and receive data from the collaboration hub in accordance with the definitions of the collaboration space.").

In conclusion, similar to other conventional techniques, Stewart's system requires its trading partner participants to exchange messages in accordance with very specific communication protocols, and Stewart contemplates that such messages will be generated by the business processes themselves. Accordingly, Stewart does not include even the slightest mention of automatically converting messages, as in the present invention.

Absent any teaching in the prior art to specifically modify Stewart's system to incorporate a capability for automatically converting a message having a data representation used by an internal business process into a corresponding message having a communication format specified by an applicable interaction standard, the present invention as recited in independent claim 1 could not possibly have an obvious in view of Stewart. Accordingly, claim 1 is believed to be allowable over the applied art.

Independent claim 8 is directed to a system that includes: an internal business process that uses a first data representation; an interaction standard that specifies a communication format for communication between the internal business process and at least one trading partner; and a trading partner conversation manager that manages conversation between the internal

business process and the trading partner by performing format conversion between the first data representation and the interaction standard.

The foregoing combination of features is not disclosed or suggested by the applied art. For instance, Stewart does not disclose or suggest a trading partner conversation manager that manages conversation between an internal business process and a trading partner, by performing format conversion between a first data representation used by the internal business process and an interaction standard specifying a communication format for communication between the internal business process and the trading partner.

In the Office Action, independent claim 8 was rejected on the same grounds as independent claim 1. The specific portions of Stewart cited in the Office Action in this regard are discussed in detail above and, for similar reasons to those set forth above, clearly do not disclose or suggest the above-referenced feature of independent claim 8. Accordingly, claim 8 also is believed to be allowable over the applied art.

The other rejected claims in this application depend from the independent claims discussed above, and are therefore believed to be allowable for at least the same reasons. Because each dependent claim also defines an additional aspect of the invention, however, the individual reconsideration of each on its own merits is respectfully requested.

New claims 21 and 22 depend from independent claims 1 and 8, respectively, and recite the additional feature that the interaction standard defines syntax for message exchanges and flow of interactions among business processes. This feature of the invention is supported, e.g., at page 3 lines 4-6 of the Specification, and particularly in combination with the other features recited in the underlying independent claims is not disclosed or suggested by the applied art.

In order to sufficiently distinguish Applicant's invention from the applied art, the foregoing remarks emphasize several of the differences between the applied art and Applicant's invention. However, no attempt has been made to categorize each novel and unobvious difference. Applicant's invention comprises all of the elements and all of the interrelationships between those elements recited in the claims. It is believed that for each claim the combination of such elements and interrelationships is not disclosed, taught or suggested by the applied art. It is therefore believed that all claims in the application are fully in condition for allowance, and an indication to that effect is respectfully requested.

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Respectfully submitted,
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